

UNITED STATES OF AMERICA

v.

Manning, Bradley E.  
PFC, U.S. Army,  
HHC, U.S. Army Garrison,  
Joint Base Myer-Henderson Hall  
Fort Myer, Virginia 22211

STIPULATION OF  
EXPECTED TESTIMONY

Mr. Wyatt Bora

10 June 2013

It is hereby agreed by the Accused, Defense Counsel, and Trial Counsel, that if Mr. Wyatt Bora were present to testify during the merits and pre-sentencing phases of this court-martial, he would testify substantially as follows.

1. I am a retired Captain in the United States Air Force. I served on active duty from 1987 to 2008. I have a BS in Computer Engineering from the University of New Hampshire in 1999. I have a Masters in Computer Engineering from Rensselaer Polytechnic Institute in 2004. In the Air Force, I primarily worked as a computer engineer and a manager of other computer engineers. I also wrote computer code and created technical software solutions. I created interactive lab displays with speech control. I managed air operations system tests and development for command and control of the Air Operations Center. I also worked as a systems engineer on large information technology (IT) systems designed to manage financial transactions. As a systems engineer, I planned IT system architecture to ensure the system worked together, managed requirements and costs, and scheduled performance tests.
2. After retiring from active duty in 2008, I began working at the Air Force Research Lab in Rome, New York, as a civilian working on acquisition of command and control IT. At the Air Force Research Lab, I managed other IT programs with a focus on command and control applications at the operational level.
3. In January 2012, I became the Program Manager (PM) for the Combined Information Database Network Exchange (CIDNE) program. As the PM for CIDNE, I am responsible for the day-to-day management of the entire program. I am responsible for finances, to include projecting budgetary requirements and meeting the program's budget. I am also responsible for ensuring that customer needs are met. Customers submit change requests that request the addition of a function or a change to current functionality. I make sure customer functionality needs are met. Customers also submit problem reports that note bugs and flaws in the system. I make sure that these bugs and flaws are corrected.
4. CIDNE is a reporting and querying system. CIDNE links operations information with intelligence information and breaks the traditional stovepipe separating the two types of information. In particular, the system linking intelligence and operations systems breaks down stovepipes between the 2 (intelligence), 3 (operations), and 5 (planning) shops. This linkage of operations information and intelligence information has been designed to provide commanders with fuller, more accurate information on which to base command decisions, particularly in the field.

5. CIDNE is a direct reporting system for the United States Central Command (USCENTCOM) and is used by USCENTCOM and its subordinate commands. In September 2007, USCENTCOM issued FRAGO 09-1290 to direct all units to use CIDNE for report creation. As a reporting system, CIDNE allows users to enter information into a report. There are approximately 130 types of CIDNE reports. Some of the 130 types of CIDNE reports are Human Intelligence (HUMINT) reports, Human Terrain reports, Counter IED (C-IED) reports, Targeting reports, Socio-Cultural reports, Civil Affairs reports, Psychological Operations (PSYOP) reports, and Significant Activity (SIGACT) reports. One of the reports frequently used by Servicemembers in the field is the SIGACT reports. A SIGACT is a report created by a Servicemember at the completion of a mission. The SIGACT is input into CIDNE for use by the unit that completed the mission and any other unit with authorized access to CIDNE. Of the approximately 130 types of reports, the SIGACT is the most commonly used report on CIDNE. SIGACTs constitute approximately 24% of all reports created, depending on the reporting period.

6. For SIGACTs and other reports, CIDNE requires completeness. CIDNE has automatic quality assurance built into the database, and a user cannot complete a report without entering information into specified fields. Additionally, CIDNE has manual quality control because most reports are reviewed for completeness by people engaged in quality assurance. The quality control mechanisms ensure that the reports contain sufficient information for future use. Furthermore, CIDNE reports are marked according to their classification, including unclassified, confidential, and secret.

7. CIDNE is also a querying system because authorized users can search the database for previous reports. A user can search by keywords, to include terms and topics, dates, and locations. This querying system allows users to see and use any report in the CIDNE system. CIDNE uses database administrators. In 2009-10, these administrators were on-site, which means they must be present at the physical location of servers, to include Iraq, Afghanistan, and Tampa, Florida. CIDNE is a complex system with millions of line of programming code due to the volume of data. In particular, creating the structure to make the data retrievable (searchable) requires significant resources. The program has continually employed approximately 20-30 or more programmers to develop, maintain, and debug the code for CIDNE so that the database may maintain all the different reports, including SIGACTS for use on classified networks. In 2007, the program spent approximately \$900,000 on data management in Iraq. In 2008, the program spent approximately \$1,000,000 on data management in Iraq. In 2009, the program spent approximately \$4,200,000 on data management in Afghanistan and \$1,800,000 on data management in Iraq. In 2010, the program spent approximately \$3,600,000 on data management in Afghanistan. In 2011, the program spent approximately \$3,000,000 on data management in Afghanistan and \$570,000 on data management in Iraq. In 2012, the program spent approximately \$5,000,000 on data management in Afghanistan. These data management costs are directly associated with keeping the data useable on the classified networks. I do not know the data management costs for Iraq for 2005, 2006, 2010, and 2012, and I do not know the data management costs for Afghanistan for 2005.

8. CIDNE has undergone constant development in its existence to improve its functionality. CIDNE is currently being developed to save costs by changing its configuration to permit

changes to reports without a developer's intervention at the physical location of the user. Responses to change requests require new code to be added. Depending on the nature of the change request, which range from adding a new field to an existing report to creating an entirely new report, coding development can take anywhere from 5 to several hundred hours. These developments require research and incur significant costs. In 2005, the program spent approximately \$1,100,000 for development and testing in Iraq and \$1,800,000 in development and testing in the Continental United States (CONUS). In 2006, the program spent approximately \$1,770,000 for development and testing in Iraq and \$790,000 in development and testing in CONUS. In 2007, the program spent approximately \$1,320,000 for development and testing in Iraq and \$1,810,000 in development and testing in CONUS. In 2008, the program spent approximately \$950,000 for development and testing in Afghanistan, \$2,690,000 for development and testing in Iraq, and \$3,610,000 in development and testing in CONUS. In 2009, the program spent approximately \$2,760,000 for development and testing in Afghanistan, \$3,280,000 for development and testing in Iraq, and \$5,500,000 in development and testing in CONUS. In 2010, the program spent approximately \$4,200,000 for development and testing in Afghanistan, \$2,650,000 for development and testing in Iraq, and \$4,980,000 in development and testing in CONUS.

9. To gain access to CIDNE, a user first needs to be authorized to access an IT system. Second, a user needs to be authorized to use a network domain authorized to host CIDNE. CIDNE and SIGACTs within CIDNE are only available on classified networks. All classified domains on which CIDNE exists require a security clearance to access. Finally, a user must be authorized to access the database. A user can obtain access only if he has a security clearance and a need to know the information accessible on CIDNE. By default, CIDNE is read only. A user must apply for permission to be granted the ability to create reports on CIDNE.

10. CIDNE currently uses 12 Centrix servers and 9 SIPRNET servers. During 2009-10, CIDNE used additional servers. Each server costs approximately \$48,000. Servers hosting CIDNE-Iraq were hosted in Iraq. CIDNE-Afghanistan servers were and are located in Afghanistan. Some servers were and are located in Tampa, Florida. In 2007, the program spent approximately \$720,000 on hardware in Iraq. In 2008, the program spent \$560,000 on hardware in Afghanistan and \$190,000 on hardware in Iraq. In 2009, the program spent approximately \$1,660,000 on hardware in Afghanistan and \$520,000 on hardware in Iraq. In 2010, the program spent \$760,000 on hardware in Afghanistan. In 2011, the program approximately spent \$180,000 on hardware in Afghanistan. In 2012, the program spent approximately \$3,680,000 on hardware in Afghanistan.


11. Before units deploy, they receive training. As PM, I am responsible for ensuring the proper resources are in place to support the various training courses offered for CIDNE. The courses range from 1 day to 2 weeks. In addition, there is a three week advanced course. Also, units conducting exercises utilize CIDNE as part of that training, and the program supports the needs of the units. In 2005, the program spent approximately \$1,100,000 for Iraq training. In 2006, the program spent approximately \$1,180,000 for Iraq training and \$480,000 for CONUS training. In 2007, the program spent approximately \$2,570,000 for Iraq training and \$200,000 for CONUS training. In 2008, the program spent approximately \$1,850,000 for Afghanistan training, \$5,220,000 for Iraq training, and \$1,550,000 for CONUS training. In 2009, the program spent

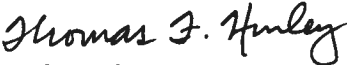
approximately \$5,360,000 for Afghanistan training, \$6,370,000 for Iraq training, and \$3,660,000 for CONUS training. In 2010, the program spent approximately \$8,140,000.00 for Afghanistan training, \$5,150,000 for Iraq training, and \$3,320,000 for CONUS training. In 2011, the program spent approximately \$18,410,000 for Afghanistan training, \$2,650,000 for Iraq training, and \$6,150,000 for CONUS training. In 2012, the program spent approximately \$8,790,000 for Afghanistan training and \$2,740,000 for CONUS training.


12. I cannot attribute a specific amount of the costs for data management, development and testing, hardware, and training to any specific report. None of these costs include operational unit costs.

13. From 2005 through 2012, the CIDNE program spent approximately \$181,160,000 on contracted support required to run the program, to include development, training, data management, and hardware. In addition, from 2005 through 2012, the program spent approximately \$5,434,800.00 on program management support, to include government testing, administrative oversight, and research and development. These costs support the development and maintenance of CIDNE, which is an information system. The hardware, to include the servers, involves significant costs. Over 25 individuals work primarily to ensure CIDNE functions correctly, and their salaries are primarily derived from their work on CIDNE. The system has been designed and developed to provide robust features to provide classified information to commanders in combat environments. The information is valuable because the system accumulates different types of information in one place for authorized officials to access and review. The United States government has dedicated significant resources—over \$185,000,000—to CIDNE because the information has significant value to commanders. Year to year increases in spending can be attributable to increased troop presence in a given nation. CIDNE has been designed to aid commanders in making operational decisions, and safety of operations decisions in particular, based on CIDNE data.

14. At no time was the SIGACT information charged in this case unavailable for access on the CIDNE database. Those that accessed the SIGACT database before May of 2010 did so in the same manner after May of 2010. We continue to use the SIGACTs charged in this case in the CIDNE database. To the best of my knowledge, the United States Government has never made these databases publically available.

  
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